

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

VEHICLE INTERFACE TECHNOLOGIES, LLC,)	
)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 12-1285-RGA
)	
JAGUAR LAND ROVER NORTH AMERICA, LLC,)	
)	
)	
Defendant.)	
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)	
VEHICLE INTERFACE TECHNOLOGIES, LLC,)	
)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 14-339-RGA
)	
JAGUAR LAND ROVER NORTH AMERICA, LLC,)	
)	
)	
Defendant.)	

**JLRNA’S MOTION TO JOIN DANIEL MITRY AND TIMOTHY SALMON
TO THE JUDGMENT AGAINST VIT**

Defendant Jaguar Land Rover North America, LLC (“JLRNA”) moves to join Daniel Mitry and Timothy Salmon to the judgment in this case as the alter egos of Vehicle Interface Technologies, LLC (“VIT”) and to hold Messrs. Mitry and Salmon jointly and severally liable for the fee award in this case that remains outstanding to JLRNA. As set forth in JLRNA’s Opening Brief, Messrs. Mitry and Salmon operated VIT as a judgment-proof shell to avoid the known risks of an attorneys’ fee award for filing this baseless litigation. The full grounds for

JLRNA's motion are set forth in JLRNA's Opening Brief and in its supporting appendix, both filed herewith.

WHEREFORE, JLRNA respectfully requests the Court to enter the attached order granting this motion.

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Dated: July 25, 2017

/s/ John W. Shaw

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